

1 THE HONORABLE JAMAL N. WHITEHEAD
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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 IN RE VALVE ANTITRUST LITIGATION

11 Civil Action No. 2:21-cv-00563-JNW

12 DECLARATION OF CARA WALLACE
13 IN SUPPORT OF EPIC'S RESPONSE TO
14 VALVE CORPORATION'S MOTION TO
15 SEAL

16 I, Cara Wallace, declare the following:

17 1. I am an attorney at the law firm Perkins Coie LLP and counsel to Epic Games, Inc.
18 ("Epic"). I am a member in good standing of the State Bar of Washington. The facts stated in this
19 declaration are based on my own personal knowledge and, if called as a witness, I could and would
20 testify to those facts.

21 2. I submit this declaration in support of Epic's response to Valve's motion to seal in
22 the above-captioned litigation.

23 3. The bolded information in Exhibit A to the Second Declaration of Kyle Billings in
24 Support of Epic's Response to Valve Corporation's Motion to Seal contains information that Epic
25 designated as "Highly Confidential – Attorney's Eyes Only" during discovery.

1 4. Counsel for Valve reached out to me after Valve filed its Motion to Seal and
2 provided a table of references to confidential Epic information that was used as part of the
3 summary judgment briefing in the above-captioned matter. Epic was not provided copies of the
4 underlying report, so it is unable to determine whether additional confidential Epic information is
5 at issue in those reports. Epic relied on the table provided by Valve to determine what of Epic's
6 information, if any, should be kept under seal.

7 5. On August 20, 2025, I met and conferred by email with Plaintiffs' and Valve's
8 counsel to discuss this information. Counsel for Plaintiffs and Valve confirmed that the parties do
9 not oppose Epic's request to keep its confidential information, as reflected by the bolded text in
10 Exhibit A to the Second Declaration of Kyle Billings dated August 21, 2025, concurrently filed,
11 sealed.

12 I declare under the penalty of perjury of the laws of the United States of America that the
13 foregoing is true and correct.

/s/ Cara Wallace

Cara Wallace